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January 10, 2025

VIA ECF

The Honorable Julien X. Neals, U.S.D.J.
United States District Court, District of New Jersey
Martin Luther King, Jr. Fed'l Bldg & U.S. Courthouse
50 Walnut Street
Newark, NJ 07102

Re: Jennifer Michaels, M.D. v. Rutgers, the State University of New Jersey, et al.
Civil Action No.: 2:15-cv-07603-JXN-CLW

Dear Judge Neals:

I write as counsel for Plaintiff Dr. Jennifer Michaels in the above-captioned matter in connection with the notice of motion that I have filed today for reconsideration of the Court's Order and Opinion of December 26, 2024. Along with the notice of motion, I have also filed a Proposed Order and a Certificate of Service. I have prepared a Memorandum of Law in support of that motion, but I have not yet filed it because it references the Court's sealed Opinion of December 26, 2024. Accordingly, I respectfully request leave to file the Memorandum of Law under seal. I am prepared to file it as soon as the Court wishes.

In the meantime, I have served copies of the Notice of Motion, Proposed Order, Certificate of Service and the as-yet-to-be-filed Memorandum of Law upon Mr. Bennett, Ms. Aversa and Ms. Posluszny, counsel for Defendants.

Thank you for your consideration.

Respectfully submitted,

s/ Neil Cartusciello
Neil Cartusciello

cc via ECF:

John Bennett, Esq.

Robyn Aversa, Esq.

Linda Posluszny, Esq.